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11 *Attorneys for Plaintiff, U.S. Bank National Association, as Trustee for Adjustable Rate Mortgage*  
12 *Trust 2005-4, Adjustable Rate Mortgage-Backed Pass-Through Certificates, Series 2005-4*

13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 U.S. BANK NATIONAL ASSOCIATION,  
16 AS TRUSTEE FOR ADJUSTABLE RATE  
17 MORTGAGE TRUST 2005-4,  
18 ADJUSTABLE RATE MORTGAGE-  
19 BACKED PASS-THROUGH  
20 CERTIFICATES, SERIES 2005-4,

21 Plaintiff,

22 vs.

23 FIDELITY NATIONAL TITLE GROUP,  
24 INC.; CHICAGO TITLE INSURANCE  
25 COMPANY; TICOR TITLE OF NEVADA,  
26 INC.; DOE INDIVIDUALS I through X; and  
27 ROE CORPORATIONS XI through XX,  
28 inclusive,

Defendants.

Case No.: 2:21-cv-01186-APG-BNW

**STIPULATION AND ORDER TO STAY  
DISCOVERY PENDING MOTION FOR  
REMAND [ECF No. 7]**

Plaintiff U.S. Bank National Association, as Trustee for Adjustable Rate Mortgage Trust 2005-4, Adjustable Rate Mortgage-Backed Pass-Through Certificates, Series 2005-4 (“U.S. Bank”) and Defendants Fidelity National Title Group, Inc., Chicago Title Insurance Company, and Ticor Title of Nevada, Inc., (collectively, “Defendants,” and with U.S. Bank, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

**WHEREAS**, on June 21, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-21-836669-C [ECF No. 1-1];

1           **WHEREAS**, on June 22, 2021, Chicago Title Insurance Company filed a Petition for  
2 Removal to this Court [ECF No. 1];

3           **WHEREAS**, on July 7, 2021, U.S. Bank filed a Motion for Remand [ECF No. 7];

4           **WHEREAS**, the Motion for Remand has been fully briefed and is pending the Court's  
5 decision [ECF Nos. 17, 20];

6           **WHEREAS**, on October 19, 2021, this Court entered its Scheduling Order [ECF No. 36].

7           **NOW THEREFORE**, the Parties, by and through their undersigned counsel, hereby  
8 stipulate and agree as follows:

- 9           1. In the interests of judicial economy, the Parties stipulate and agree that discovery in  
10           this case shall be **STAYED** pending the Court's decision on U.S. Bank's Motion for  
11           Remand [ECF No. 7];
- 12           2. The Scheduling Order [ECF No. 36] in this case is hereby **VACATED**.
- 13           3. The Parties shall not file any motions to enforce Party discovery while this stay is  
14           pending.
- 15           4. Each of the Parties shall be excused from responding to any now-outstanding discovery  
16           requests propounded by the other until after the stay is lifted.
- 17           5. Nothing contained in this stipulation will prevent the Parties from propounding and  
18           enforcing third party subpoenas.
- 19           6. Nothing contained in this stipulation will not affect any pending dispositive motions  
20           or prevent the Parties from filing any dispositive motions.
- 21           7. Each of the Parties may request a further Fed R. Civ. P. 26(f) conference at any time  
22           180 days after the order granting this Stipulation.
- 23           8. By entering into this Stipulation, none of the Parties is waiving its right to subsequently  
24           move the Court for an order lifting the stay in this action.

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1 9. In the event the Motion for Remand is denied and this Court retains jurisdiction, the  
2 Parties will submit a proposed discovery plan within thirty (30) days of the Court's  
3 Order.

4 **IT IS SO STIPULATED.**

5 DATED this 24th day of February, 2022.

DATED this 24th day of February, 2022.

6 WRIGHT, FINLAY & ZAK, LLP

EARLY SULLIVAN WRIGHT  
7 GIZER & McRAE LLP

8 /s/ Lindsay D. Dragon

/s/ Sophia S. Lau

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12 *Attorneys for Plaintiff, U.S. Bank National*  
13 *Association, as Trustee for Adjustable Rate*  
14 *Mortgage Trust 2005-4, Adjustable Rate*  
*Mortgage-Backed Pass-Through Certificates,*  
*Series 2005-4*

*Attorney for Defendants Fidelity National*  
*Title Group, Inc., Chicago Title Insurance*  
*Company, and Ticor Title of Nevada, Inc.*

15 **IT IS SO ORDERED.**

16 Dated this 25th day of February, 2022.

17   
18 UNITED STATES MAGISTRATE JUDGE